

### **Remarks**

#### **General:**

Claims 30 to 56 were pending in the application before this amendment. Claim 56 is cancelled. Claims 30, 31, 34, 37-41, 43-48 and 50 are amended. Claims 30-55 are pending in the application after this amendment.

Claim 30 has been amended to recite means for cleaning and/or sanitizing one or more parts of the apparatus. The means being either part of the separable water treatment component or being a separable sanitizing component that is adapted to be incorporated into the apparatus in place of the water treatment component. Support for this amendment can be found at least in prior claim 50, and the description at page 6, line 24 through page 7 line 1.

Claims 31, 34, 37-41 and 44-46 have been amended to clarify the component as the water treatment component.

Claim 43 is rewritten in independent form, with clarifying changes to the wording. Support for the changes is found at least in the description at page 3, lines 25-27.

Claim 47 has been amended to recite that the electronic circuit of the apparatus monitors the status of the component attached to the apparatus and provides an indication on a display of an incorrect installation of a component based on a lack communication between the electronic circuit of the water treatment apparatus and the electronic circuit of the component. Support of this amendment can be found at least in prior claim 43.

Claim 48 has been amended to recite that the water treatment component comprises a cartridge containing ion exchange resin. Support for this amendment can be found on page 6, line 22.

Claim 50 has been amended into independent form.

No new matter has been added to the application.

#### **35 U.S.C. § 102:**

Claims 30-49 and 51-56 were rejected as anticipated by U.S. Patent No. 5,674,381 (Den Dekker).

As noted above, claim 30 has been amended to recite means for cleaning and/or sanitizing one or more parts of the apparatus. The means being either part of the separable water

treatment component or being a separable sanitizing component that is adapted to be incorporated into the apparatus in place of the water treatment component. The sanitizing feature is described in claim 50 which was not subject to the §102 rejection. Furthermore, Den Dekker does not describe nor suggest any sanitizing structure which is attachable to the apparatus as part or replacement of a water treatment component. Accordingly, claim 30 is not anticipated by Den Dekker.

Furthermore, there is no suggestion in Den Dekker or any other reference of record to include a separable sanitizing component in the device in Den Dekker. As noted below, the citation in the office action of U.S. Patent No. 6,471,853 (Moscaritolo) does not support a obviousness rejection of claim 30. Moscaritolo does not disclose filter cleaning. On the contrary, the cited passages of Moscaritolo merely describe a sensor “to determine ... whether a filter element must be replaced or reconditioned,” col. 1, lines 15-18, and “to predict ... the amount of time left before the filter will need to be replaced or reconditioned,” col. 6, lines 50-52. No actual filter cleaning is not disclosed.

Furthermore, claim 30 recites that the means for cleaning or sanitizing provides cleaning or sanitizing of the *host apparatus*. This is not the same as reconditioning the *filter* (the *removable component*) as implied by Moscaritolo. It is respectfully pointed out that a removable component that *cleans*, as recited in claim 30, is not the same as a removable component that *needs to be cleaned*, as mentioned in Moscaritolo. There is no disclosure or suggestion in Moscaritolo of a removable component that cleans the host apparatus. Indeed, it would be impossible to derive such a component from Moscaritolo’s disclosure. Moscaritolo suggests only cleaning of the filter element 2, which is the removable component.

Accordingly, it is respectfully submitted claim 30 is nonobvious over Den Dekker in view of the prior art of record including Moscaritolo.

Claims 31-42 and 44-46 depend from claim 30 and, therefore, are also not anticipated by nor obvious over Den Dekker in view of the prior art of record.

Claim 43 has been rewritten in independent form. Claim 43 recites a system wherein the lack of co-operation between the electronic circuit of the component and the electronic circuit of the host apparatus indicates the incorrect fitment and/or installation of the component with the host apparatus. Claim 43 was rejected on the ground that Den Dekker at col. 1, line 52 teaches “identifying of incorrect fitment.” The rejection is traversed. The cited passage from Den

Dekker refers only to “the fitting of an incorrect filter.” In Den Dekker, the device detects when an incorrect filter is correctly fitted. Claim 43 is concerned with ensuring that the filter or other component is correctly fitted. If a correct filter is incorrectly fitted, the system of claim 43 will detect that error with the electronic circuit. The two errors are different and, thus, the systems of claim 43 and of Den Dekker are different from one another. Furthermore, Den Dekker only discloses that insertion of an incorrect filter prevents the unit from turning on. Col. 2, line 39-42. This is clearly not the same as detecting a filter that is not correctly inserted. The opportunity has been taken to refine the wording of claim 43 to make this distinction more immediately apparent. Support for the new wording of claim 43 is found at least in the specification at page 3, lines 25-27.

There is no disclosure or suggestion in Den Dekker of a system having the features of claim 43, and claim 43 is, therefore, both new and non-obvious over Den Dekker.

Claim 47 has been amended to recite that the electronic circuit of the apparatus monitors the status of the component attached to the apparatus and provides an indication on a display of an incorrect installation of a component based on a lack communication between the electronic circuit of the water treatment apparatus and the electronic circuit of the component. This claim is similar to claim 43, and the arguments presented above with respect to claim 43 also apply to claim 47. In Den Dekker, the device detects when an incorrect filter is correctly fitted. Claim 47 is concerned with ensuring that the filter or other component is correctly fitted. If a correct filter is incorrectly fitted, the system of claim 47 will detect that error by a functional disconnect between the electronic circuit in the apparatus and the component. The two errors are different and, thus, the systems of claim 47 and of Den Dekker are different from one another. Furthermore, Den Dekker only discloses that insertion of an incorrect filter prevents the unit from turning on. Col. 2, line 39-42. There is no disclosure or suggestion in Den Dekker of a system that provides an indication on a display of an incorrect installation of a component. To the contrary, Den Dekker teaches away from such a device since the Den Dekker device is prevented from turning on at all. It would be impossible for the device in Den Dekker to display anything. Thus, claim 47 is both new and non-obvious over Den Dekker.

Claim 48 has been amended to recite that the water treatment component comprises a cartridge containing ion exchange resin. Den Dekker does not mention any ion exchange resin in its filter devices. On the contrary, Den Dekker mentions use of a “mechanical filter in which the

fluid is guided through a porous material or a material structure having small passage opening separating solid matter from the fluid.” See, col. 2, lines 1-5. Thus, claim 48 is not anticipated by Den Dekker. Furthermore, since Den Dekker discloses nothing beyond a mechanical filter, there can be no suggestion or motivation to modify the filter of Den Dekker to include a cartridge with ion exchange resin. None of the other prior art of record suggests alone or in combination the features of claim 48. Accordingly, claim 48 is not anticipated by nor obvious over Den Dekker or any other references of record. Claims 49 and 51-55 depend from claim 48 and, therefore, are also not anticipated by nor obvious over Den Dekker.

### **35 U.S.C. § 103:**

Previous claim 50 was rejected as obvious over Den Dekker in view of U.S. Patent No. 6,471,853 (Moscaritolo). Claim 50 has been amended into independent form.

Claim 50 recites that the separable component “is adapted to sanitize and/or clean one or more parts of the host apparatus.” The office action cites Moscaritolo as showing a device “that initiates filter cleaning.” In fact, Moscaritolo does not even show that. The cited passages of Moscaritolo merely describe a sensor “to determine ... whether a filter element must be replaced or reconditioned,” col. 1, lines 15-18, and “to predict ... the amount of time left before the filter will need to be replaced or reconditioned,” col. 6, lines 50-52. No actual filter cleaning is not disclosed.

It is respectfully pointed out that cleaning or sanitizing the *host apparatus*, as recited in claim 50, is not the same as reconditioning the *filter*, that is to say, the *removable component*, as implied by Moscaritolo. It is respectfully pointed out that a removable component that *cleans*, as recited in claim 50, is not the same as a removable component that *needs to be cleaned*, as mentioned in Moscaritolo. There is no disclosure or suggestion in Moscaritolo of a removable component that cleans the host apparatus. Indeed, it would be impossible to derive such a component from Moscaritolo’s disclosure. Moscaritolo suggests only cleaning of the filter element 2, which is the removable component.

For all of the above reasons, claim 50 is not only new but also non-obvious over the combination of Den Dekker and Moscaritolo.

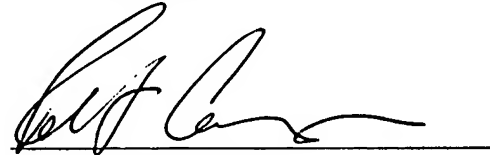
**Conclusion:**

It is respectfully submitted that all pending claims are in condition for allowance, and respectfully requested that allowance be granted at the earliest date possible. Should the Examiner have any questions or comments regarding Applicants' amendments or response, the Examiner is asked to contact Applicants' representative below.

Respectfully submitted,

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